

Executive Summary

This report documents the public scoping process of the Bureau of Land Management's Richfield Field Office Resource Management Plan and Environmental Impact Statement. The report includes a description of the scoping process and an overview of the planning schedule. A description of each of the five scoping meetings and the subjects considered follows, with a summary of the comments submitted by mail, e-mail, fax, and petition. In addition, an overview of the issues identified through all scoping comments is included in this report.

The purpose of the scoping process is to identify issues important to the future management of public lands and resources. These issues will guide development of alternatives that will be evaluated in the Environmental Impact Statement (EIS) and will ultimately guide development of the Resource Management Plan (RMP). The scoping process also provides an opportunity to educate the general public about the management of public lands and for the Bureau of Land Management (BLM) to gauge the concerns of those who have a stake in the resources of the area.

Throughout this scoping process, the BLM approach has been one of open communication and dialogue. The agency solicited input far beyond minimum requirements. For example, the agency is required to extend scoping for 30 days, but in this case, the scoping period was extended to 151 days. Five meetings were held in locations throughout the resource area, as well as the state capital. Comments were accepted in a variety of formats to ensure that those who wished to participate could do so effectively.

This report is intended to summarize the issues identified through the scoping process. It includes the concepts discussed at the public scoping meetings and letters from individuals and organizations.

Plan Overview

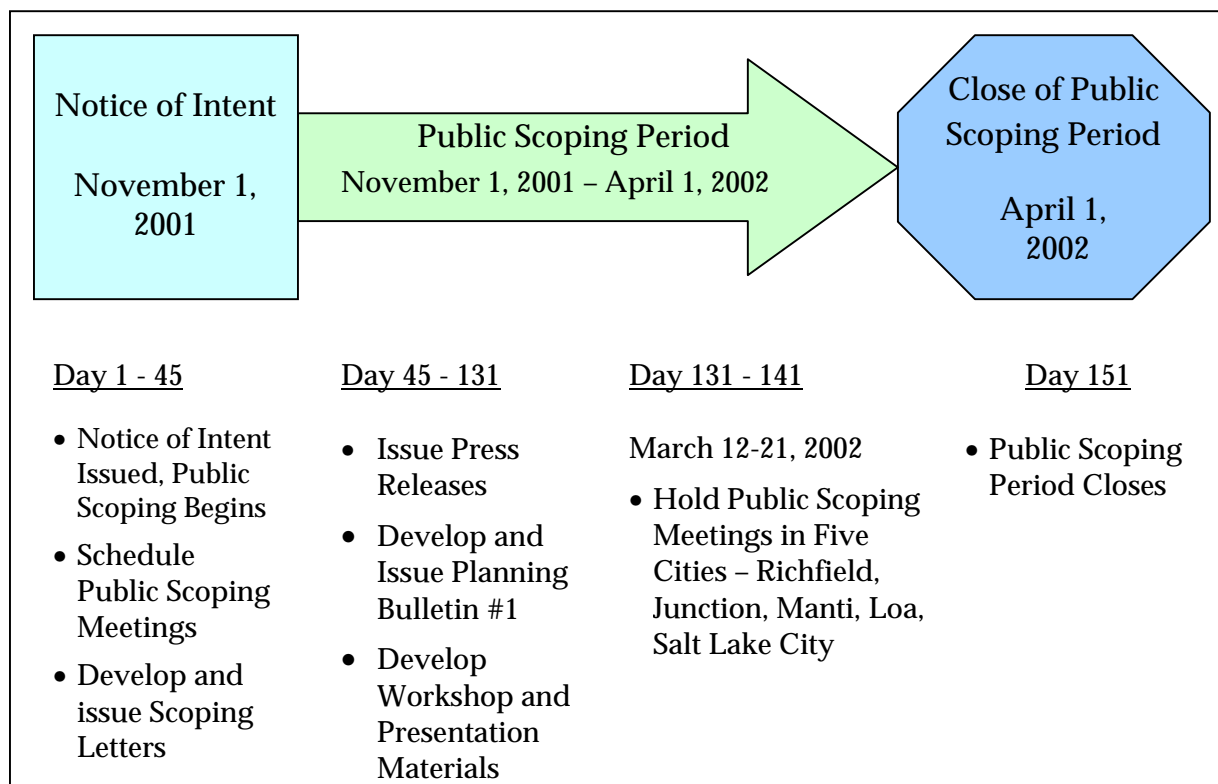
The BLM Richfield Field Office (Richfield FO) has initiated the planning process to develop an RMP for approximately 2.2 million acres of public lands and resources in central Utah, as well as the mineral estates on portions of land managed by the Uinta, Fishlake, Manti LaSal, and Dixie National Forests. This plan, known as the Richfield RMP, will combine five existing land use plans into a single plan. As part of this project, an Environmental Impact Statement (EIS) will also be prepared.



Richfield BLM Management Area

Public Scoping And Issue Identification

Upon publication in the Federal Register of the Notice of Intent (NOI) to prepare an RMP, the BLM Richfield FO initiated the public scoping process. This process included five public scoping meetings. The initial public scoping period extended from November 1, 2001 through April 1, 2002, a total of 151 days.



Public Scoping Process Timeline

During the five meetings, 182 people registered their attendance. The meeting format allowed each person attending to share his or her issues and concerns in regards to the BLM Richfield FO management area. Additional comments were received through letter, email and fax. Approximately 1,780 unique comments from nearly 450 letters/faxes/emails and two petitions signed by over 600 individuals were received. Comments were compiled according to topic, with comments falling into approximately 12 topic areas. These include:

- Transportation Access
- Local Economic Impact
- Administrative Issues
- Rangeland Health /Livestock Grazing
- Special Land Designations (Wilderness Study Areas)
- Recreation/OHV
- Air & Water Quality
- Mineral Development
- Cultural/Historic Resources
- Wildlife/Hunting
- Forestry
- Realty

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Appendix G is available at the Richfield Field Office and the BLM's Utah State Office.

1 – Introduction

The Bureau of Land Management (BLM) Richfield Field Office (Richfield FO) currently manages approximately 2.2 million acres of public lands and resources in Sanpete, Sevier, Piute, Wayne, and Garfield Counties, Utah and the leaseable mineral estate under these public lands and portions of the Uinta, Fishlake, Manti LaSal, and Dixie National Forests. These lands are presently managed under the following five existing land use plans:

- Mountain Valley Management Framework Plan (MFP), 1982.
- Henry Mountain MFP, 1982
- Parker Mountain MFP, 1982
- Cedar-Beaver-Garfield-Antimony Resource Management Plan (RMP), 1984.
- San Rafael RMP, 1991.

The existing plans are out of date with respect to current resource conditions, public values, laws, regulations and policies. The Richfield Field Office RMP will, pursuant with the Federal Land Policy and Management Act (FLPMA), revise these land use plans resulting in a consolidated document with updated information and guidance on new and changing resource uses.

In compliance with the National Environmental Policy Act (NEPA), the Richfield FO initiated a scoping process to determine issues related to the development of an RMP and the associated Environmental Impact Statement (EIS). This report describes the scoping process and provides a summary and analysis on the content and type of comments received. Section 2 provides a schedule of events for the EIS and RMP. Section 3 describes how scoping was conducted and includes a summary of comments received, both from public meetings and written comments. Section 4 provides the analysis of all scoping comments in the form of issues and management concerns. Section 5 discusses the issues brought forth through the scoping process that are beyond the scope of the EIS and RMP.

2 - Richfield Field Office RMP/EIS Planning Schedule

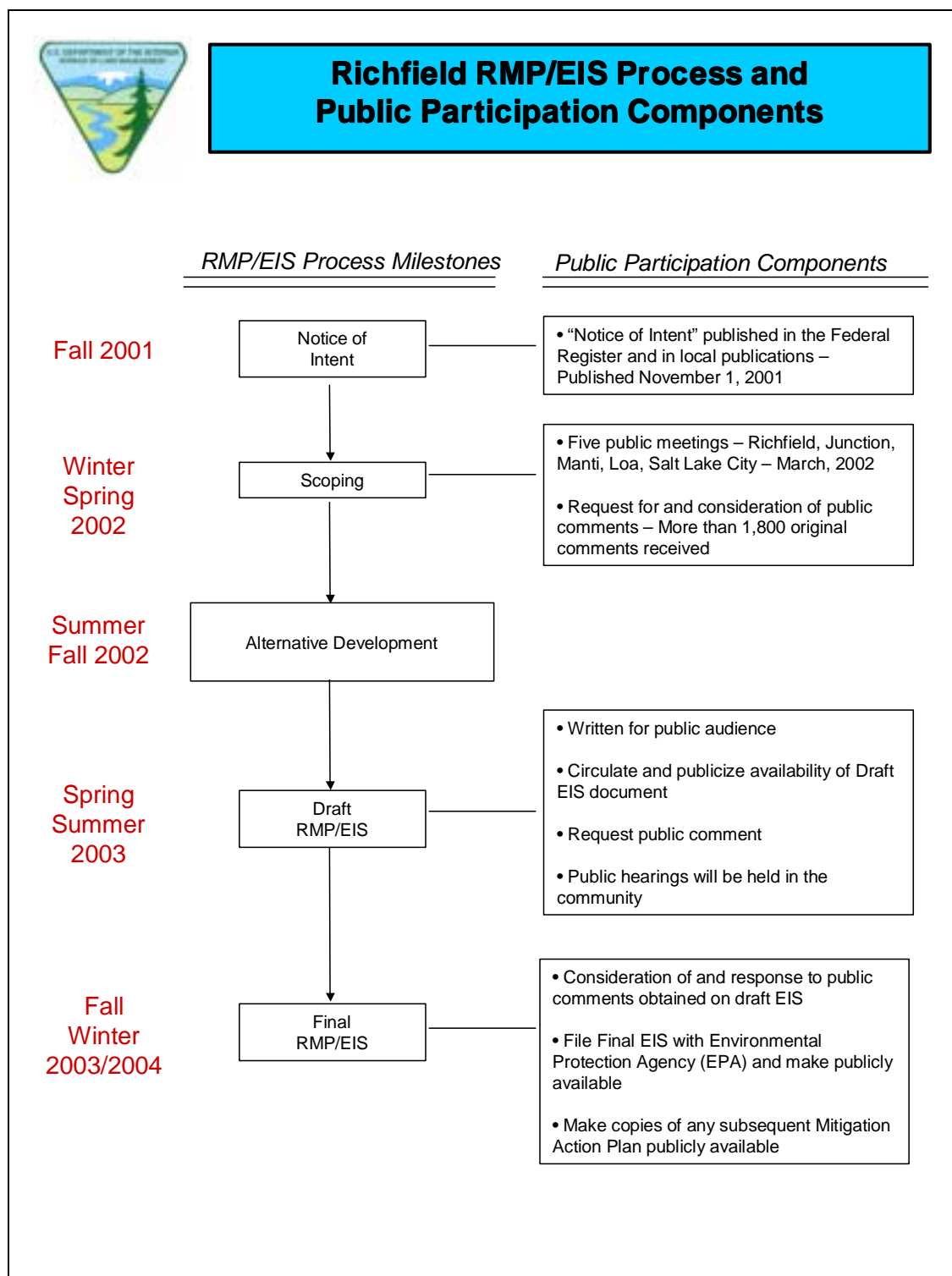


Figure 2.1. Richfield Field Office RMP/EIS Planning Schedule

3 - Scoping Process

In November 2001, the Bureau of Land Management (BLM) Richfield Field Office (Richfield FO) initiated its scoping process with the publication of a Notice of Intent (NOI). Scoping is the process required by the National Environmental Policy Act (NEPA) in the early stages of developing an Environmental Impact Statement (EIS) to determine the scope and significance of issues related to a proposed action, in this case, the writing and implementation of a new Resource Management Plan (RMP) (40 CFR 1501.7). Knowing the scope and the significance of issues allows for an accurate and timely environmental analysis. In addition to this, scoping helps identify issues important to the management of the area, as well as issues to be examined in the planning process. The scoping process is designed to encourage public participation and to solicit public input.

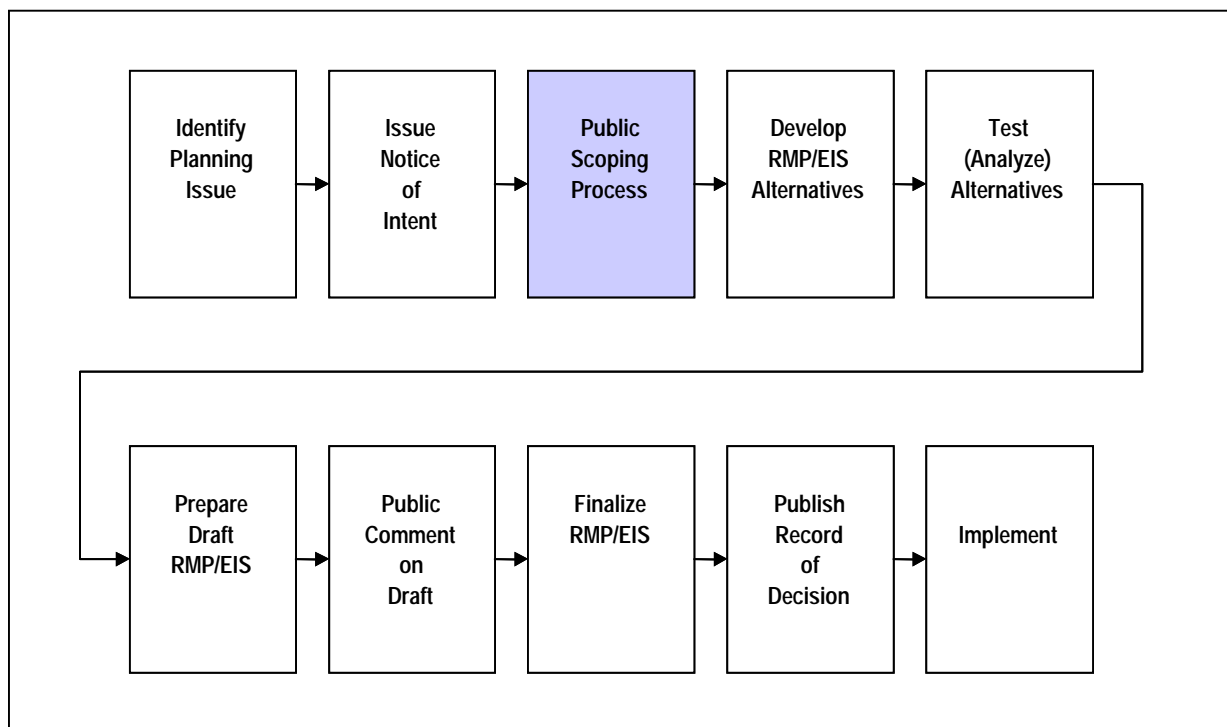


Figure 3.1. Planning Process

The importance of the scoping process becomes evident as the planning process continues (Figure 3.1). After gathering public comments on what issues the RMP and EIS should address, the suggested issues will be placed in one of three categories:

1. Issues to be addressed in the plan;
2. Issues addressed through other policy or administrative action; or
3. Issues beyond the scope of the plan.

Rationale will be provided in the plan for each issue placed in category two or three. Alternatives will then be developed and analyzed to resolve the issues identified during the scoping process and the Draft RMP/Draft EIS will be published and made available for public review.

In accordance with the planning schedule (Section 2), the scoping process formally began with the publication of the NOI in the *Federal Register* on November 1, 2001, documenting BLM's intent to prepare an RMP (Appendix C). The public scoping period was open for 151 days. Throughout the scoping process, BLM representatives made presentations to the County Commissioners from the five counties in the Richfield FO area, user groups, and other interested parties. In addition to this, interested individuals and organizations, affected Federal, State, and local agencies, as well as affected Indian Tribes were invited to submit comments to the BLM. The rest of this section will address those comments and the way they were received.

Public Scoping Meetings

Public scoping meetings provide an opportunity for interested parties to submit scoping comments and may be a part of the early and open scoping process NEPA requires (40 CFR 1501.7). These meetings are especially important when there is "substantial environmental controversy concerning the proposed action or substantial interest in holding the [meeting]" (40 CFR 1506.6c1).

Meeting Logistics and Attendance

The NOI (Appendix C) announced a minimum of four public scoping meetings. The location of the meetings was determined through communication with the County Commissioners from the five counties in the Richfield FO area. BLM offered to hold a scoping meeting at each county's seat. Four of the five counties accepted the offer, with Garfield County, where the Richfield FO manages only a portion of the Federal land, declining. In addition to these four meetings, a fifth meeting was added in Salt Lake City, the capital of Utah, in response to public interest.

Public notice of the scoping meetings was published in the *Ephraim Enterprise*, *Manti Messenger*, *Garfield County News*, *Gunnison Valley News*, *Salina Sun*, *The Insider* (a Loa publication), *The Pyramid* (A Mt. Pleasant publication), *The Richfield Reaper*, *The Daily Herald*, *The Salt Lake Tribune* and *Deseret News* (Appendix D). These were all published near the end of February, ranging from February 20 to February 24, 2002.

A press release was sent to all the above newspapers, the Manti radio stations KMTI/KMXU, the Richfield radio stations KSVC/KCYQ, the County Commissioners of the five Counties, and to the Utah offices of Congressmen Cannon, Matheson, and Hansen (Appendix D). In addition to these announcements in the public press, BLM posted fliers throughout the counties in locations of heavy traffic such as Post Offices, local convenient stores, supermarkets, municipal buildings, local businesses, and local recreation sites (see Appendix D for a flier location log and sample fliers).

The five public meetings were held over a two-week period in mid-March. The total registered attendance for all five meetings was 182 people (Table 3.1). The number of participants in communities closest to the planning area indicates the high level of local interest in the planning and management of the area.

Table 3.1
Meeting Location/Attendance

Meeting Location	Meeting Date	Attendance
Richfield, UT	March 12, 2002	48
Junction, UT	March 13, 2002	28
Manti, UT	March 14, 2002	24
Loa, UT	March 19, 2002	52
Salt Lake City, UT	March 21, 2002	30
Total		182

Attendance at each public scoping meeting was measured using a sign-in sheet for attendees to sign at the door(s). An example of this sign-in sheet can be found in Appendix F. A public information packet was made available to all in attendance. The contents of this packet can be found in Appendices E and F (minus the sign-in sheet).

Number and Type of Comments Received

Comments were solicited in a manner that provided an opportunity for everyone attending the public meetings to speak. Following a brief introduction to the planning process, the meeting facilitator went around the room, person by person, and provided an opportunity for each attendee to voice the issues important to him or her. Meeting comments were recorded in two ways. First, the facilitator had every comment written on a large poster positioned at the front of the room. In addition to this, an employee took complete notes of the meeting. These two records were later compared to ensure all comments voiced were received. These records resulted in the following analysis and are in the public record. For those who chose not to speak before those at the public meeting several other avenues were provided and the facilitator encouraged comments in any one of these other forms.

There were 560 individual comments received from the five public meetings. Individual comments were coded by primary topic, regardless of the position of the comment towards the topic. A wide range of comments was recorded, with some topics being repeated more often than others. Some comments addressed more than one comment category, or topic; these comments were coded by the primary topic unless the associated topics were of equal importance to the issue being presented, in which case the comment was coded under each comment category. An example of this includes comments regarding Off-Highway Vehicle (OHV) access for grazing administration purposes. There are three potential topics presented, with access as the primary topic. Comments coded as "Other" generally discussed very broad management concepts or very specific issues.

The resulting enumeration (Table 3.2; Figure 3.2) indicates the relative interest of meeting attendees towards various broad topics in a position-neutral perspective. This enumeration is not intended to show bias on any issue, merely to indicate the relative level of interest in that issue area.

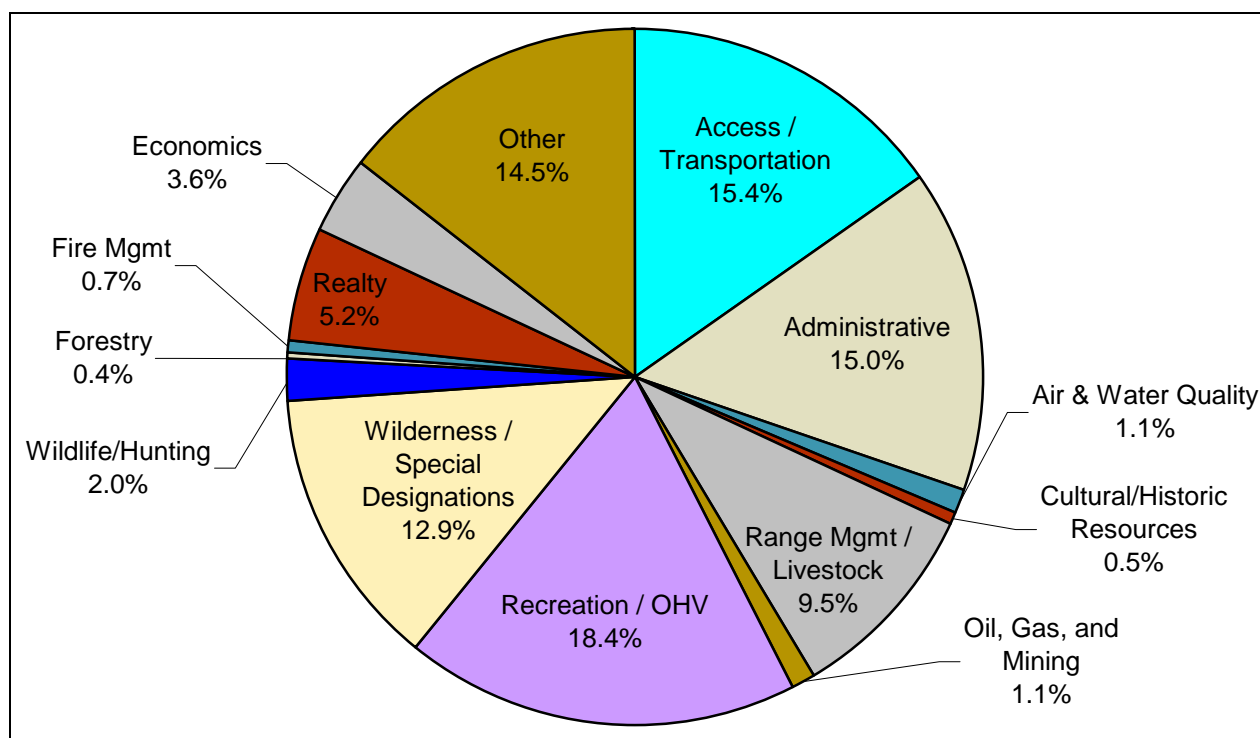


Figure 3.2 Public Scoping Meetings: Comment Categories Enumeration Graph

Table 3.2

Public Scoping Meetings: Comment Category Enumeration

Comment Category	Number Received	Percentage
Access / Transportation	86	15.4
Administrative	84	15.0
Air & Water Quality	6	1.1
Cultural/Historic Resources	3	0.5
Range Mgmt / Livestock	53	9.5
Oil, Gas, and Mining	6	1.1
Recreation / OHV	103	18.4
Wilderness / Special Designations	72	12.9
Wildlife/Hunting	11	2.0
Forestry	2	0.4
Fire Mgmt	4	0.7
Realty	29	5.2
Economics	20	3.6
Other	81	14.5
Total	560	100.0

Summary of Meeting Comments

While each public scoping meeting raised unique issues and concerns, a number of common elements materialized. When all the public meetings are viewed as a whole, the ideas and concerns relating to motorized access and OHV use were the most frequently mentioned. Individuals at each meeting expressed serious concern over OHV management and access to public lands, sometimes relating the two and sometimes representing the two as separate issues. In general, comments received on OHV use, and access in general, expressed the sentiment that maintaining motorized access to the planning area was preferred over limiting that access. Some commentors, however, did acknowledge the possible benefits from partially limited access.

As mentioned above, many meeting participants had serious concerns over the possibility that access to area resources would be limited by this planning effort. This concern is directly linked to another topic that was prevalent through the meetings: wilderness and special designations. Several individuals commented that wilderness inventories were flawed; they stated that there are roads in current and potential Wilderness Study Areas (WSA). Some individuals proposed that more wilderness areas meant less access, while other individuals desired to see the wilderness issue resolved, regardless of the outcome. Some meeting attendees were directly opposed to one another on the wilderness issue, with some individuals requesting more wilderness while others stated that there was enough wilderness.

Another theme that permeated the meetings is not evident in the enumeration analysis. This theme, coded as “Administrative” comments, was received from individuals who wanted to see more local input into the planning process and eventual management of public lands. These individuals varied in their definitions of local input. Some defined it as a committee made up of local leaders who make decisions and provide direction while others wanted flexibility built into the RMP to allow local BLM officials to make management decisions based on varying circumstances. Still others wanted to have local opinions heard, both during the planning process and beyond.

There were a variety of scoping meeting comments on other topics, including, but not limited to the following:

- The need for economic impacts on the local communities to be acknowledged and analyzed in the RMP and EIS;
- Concern for grazing and range management, both for the continuation of a historic use and improved management of range resources;
- Better management of and continued use for recreational OHV users, including signage and trail maps and markers;
- Continued OHV access for permitted users, such as livestock management and firewood gathering;

- Realty issues, such as land swaps with the State Institutional Trust Lands Administration (SITLA);
- Provide for responsible oil and gas development;
- Write a plan that is enforceable (money, time, and manpower);
- Manage the resources through education and enforcement, not just more rules;
- Concern with negative impacts wildlife has on livestock and ranchers;
- Provide a diversity of recreation uses; and
- Protect riparian areas and watersheds.

There were many individual comments recorded, but the majority of those comments fell into the following categories:

Access: The RMP needs to address access and transportation issues in a manner that will satisfy both the need for access to the area and its resources, as well as devising a careful strategy to protect the area, its resources, and the ecosystem from destructive uses.

OHV Use: OHV use needs to be carefully examined and planned for with the coordinated involvement and input of local communities.

Local Input: There needs to be close and constant communication between BLM and local leaders/individuals/users.

Rangeland Health: Rangeland health and grazing allotments need to be examined in the EIS and RMP, and a strategy for maintaining public lands ranching should be included.

Recreation: Increasing amounts of all types of recreation uses need to be planned for and adequate facilities, information, and a wide spectrum of opportunities needs to be provided.

Special Designations: The EIS and RMP needs to address WSAs and other special designations such as Wild and Scenic Rivers and Areas of Critical Environmental Concern (ACEC), with a focus on wilderness management, inventories, and new WSAs.

The comments received from the public scoping meetings were added to the written comments to complete the collection of public input.

Comment Summary by Meeting Location

While addressing the scoping meetings as a whole provided the above information, each public scoping meeting raised a unique combination of issues and concerns. The following is a summary of meeting comments from each scoping meeting.

Richfield (March 12, 2002)

Total Registered Attendance: 48

Comments received from the Richfield scoping meeting focused heavily on access and recreation management. Nearly half the comments received focused on one of these two issues. The most common position advocated keeping as much land accessible to motorized access as possible, though there were some comments for closing parallel or particularly damaging routes. Education of recreation users was mentioned several times, mostly regarding maps, signs, and interactions with other land users. Another recreation related issue was the desire for the RMP to provide for diverse recreation opportunities, such as dispersed camping, various trails for limited use (hiking or horse only), and providing extensive OHV trail systems.

Other comments received at the Richfield scoping meeting include the following:

- Re-introduction of wild turkeys
- Address grazing management and allow range improvements
- Plan for responsible and foreseeable development of oil, gas, and mineral resources
- Object to potential WSAs, but want to preserve some pristine areas
- Ensure the BLM has the ability/resources to provide proper enforcement and education

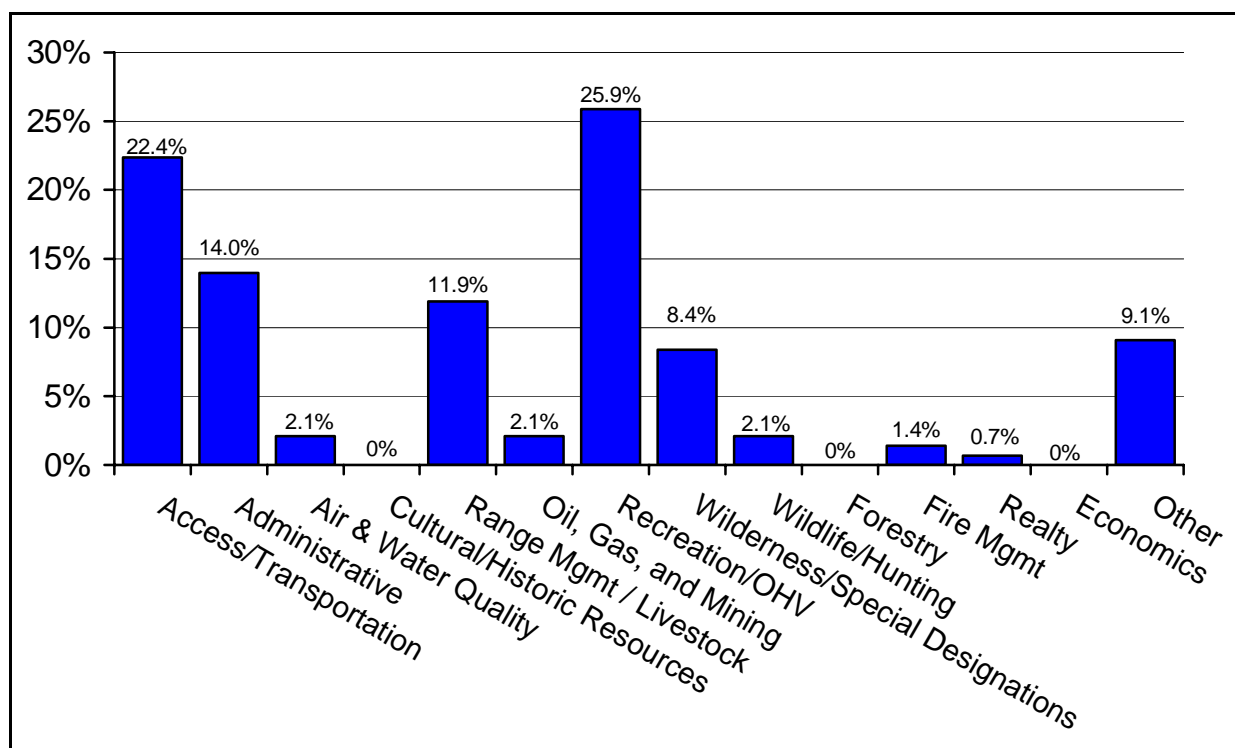


Figure 3.3. Richfield Scoping Meeting Comments

Junction (March 13, 2002)

Total Registered Attendance: 28

Comments received from the Junction scoping meeting varied from both the Richfield meeting and from the compilation of all the meeting comments. More individuals voiced a desire for the BLM to continue multiple-use management than at other meetings. Commentors were also concerned over the amount of local involvement and direction in making management decisions. Other major themes in the Junction meeting included continued access to public lands and resources. There were several comments stating that wilderness designation “locked up” the land. There were several comments that questioned the accuracy of existing wilderness inventories.

Other comments received at the Junction scoping meeting include:

- Protection/management of wildlife should not override domestic animals and thereby harm grazing permittees
- Analyze the effect that withdrawals have on the economy of the counties
- OHV trails should be protected, but also managed
- More land should be available for mining
- Allow ATV access for "husbandry" purposes
- Opposed to too much wilderness (there are already too many restrictions on how we can use public lands)

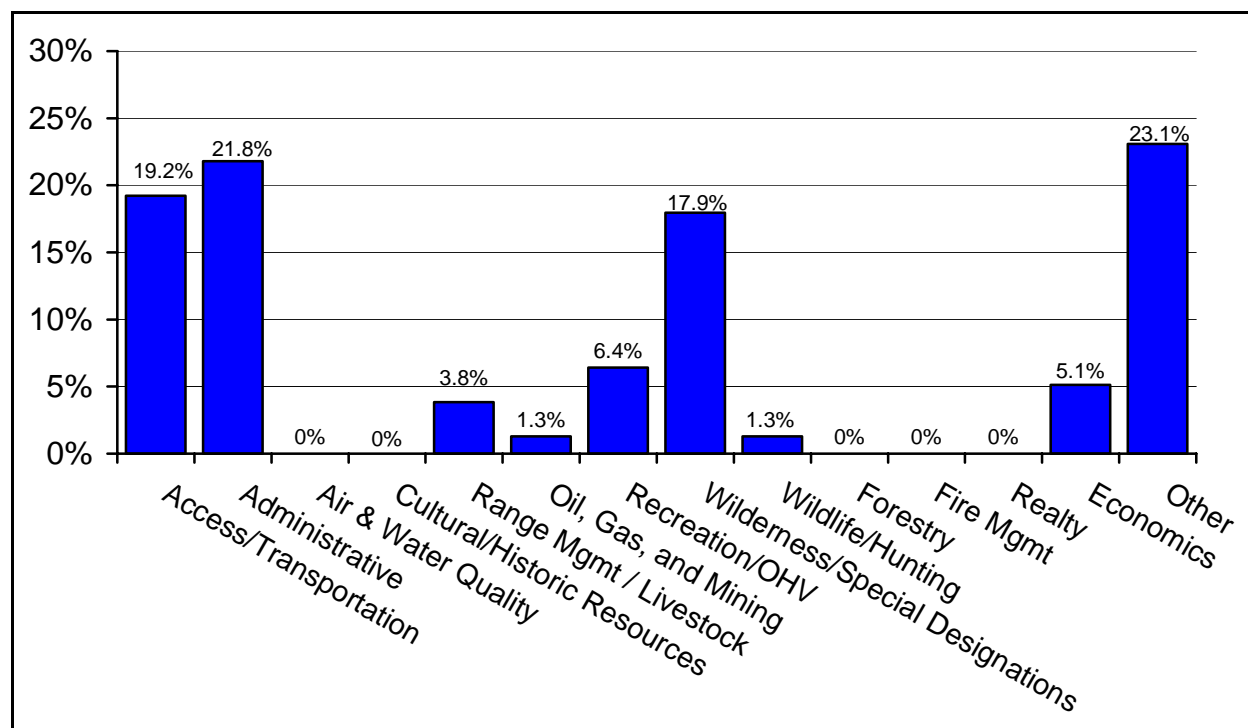


Figure 3.4. Junction Scoping Meeting Comments

Manti (March 14, 2002)

Total Registered Attendance: 24

Manti's public meeting, though low in registered attendance, raised certain issues not addressed in other meetings. Comments regarding range management issues were most frequent, including issues such as pest control and management, invasive species management, predator control, range management tools (fire, chaining, etc.), and the re-activation of Grazing Advisory Boards. Other significant categories include public participation and direction, which is related to writing planning documents so they are easily understood the general public. As with other meetings, motorized access issues were common in Manti, both relating to recreation and other uses. Finally, the effectiveness of wilderness designations, inventories, and management were questioned as land management strategies.

Other comments received at the Manti scoping meeting include:

- Maintain OHV use for "administrative purposes" (permittee use)
- Integrate Fire Management into the RMP
- Preserve cultural uses of the land (cowboys)
- Integrate an economic impact analysis in the RMP that analyses the economic impact of all planning options
- Manage for OHV accessibility
- Address and set standards for seed collection on BLM land

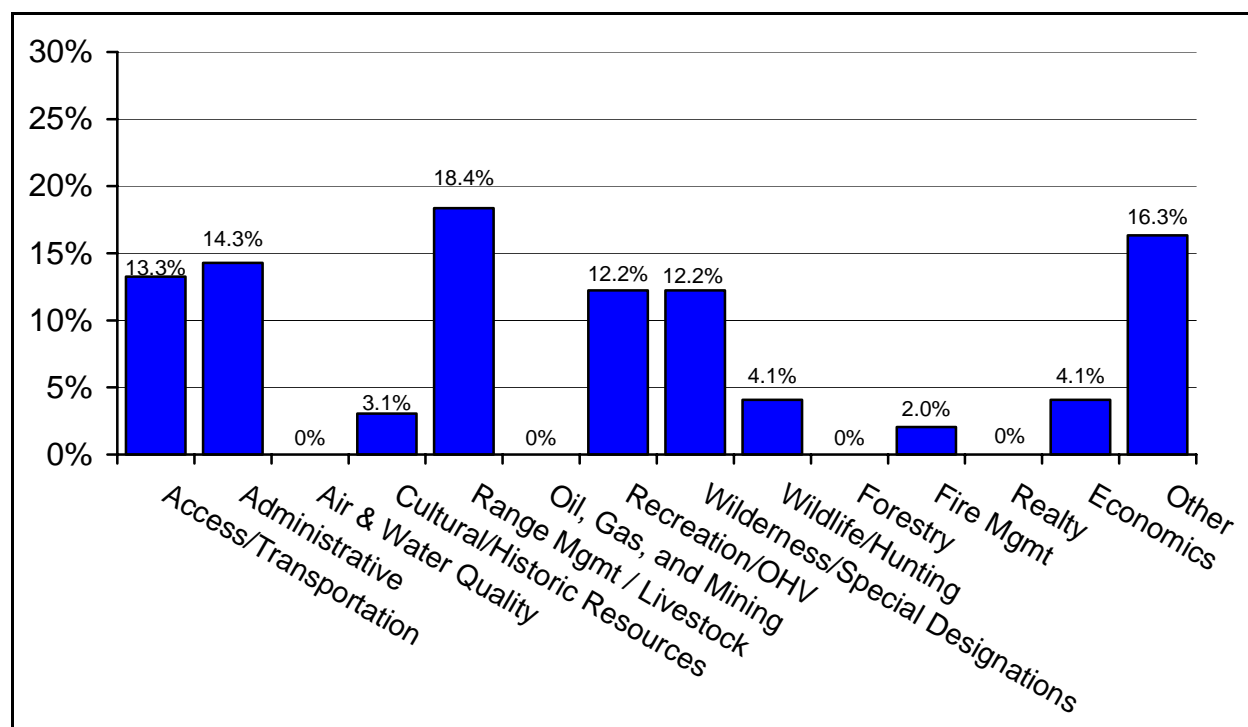


Figure 3.5. Manti Scoping Meeting Comments

Loa (March 19, 2002)

Total Registered Attendance: 52

Loa was the most heavily attended public scoping meeting, and several issues were introduced. Comments about realty were more prevalent in Loa than any other meeting, with general opposition to BLM land trades, especially with SITLA. There were, however, comments in favor of these trades. Wilderness issues were also discussed, with several comments for no more wilderness, some for buffer zones between private land and WSAs, and some others just wanting closure on the wilderness issue. Public input was mentioned several times, suggesting that public partnerships be established to help manage the land. Comments in Loa tended to favor more management of recreational resources, leaning heavily towards education of recreation users, dispersed camping, and diverse recreational options built into the RMP.

Other comments received at the Loa scoping meeting include:

- Manage for diverse populations of wildlife
- BLM land is tied to the economies of local communities and should be analyzed
- Wild and Scenic River designation may affect public access to water rights
- Develop better forest management plans
- Provide for the development of mineral resources
- Protect, use, and maintain water rights
- Coordinate cross boundary issues between BLM management areas

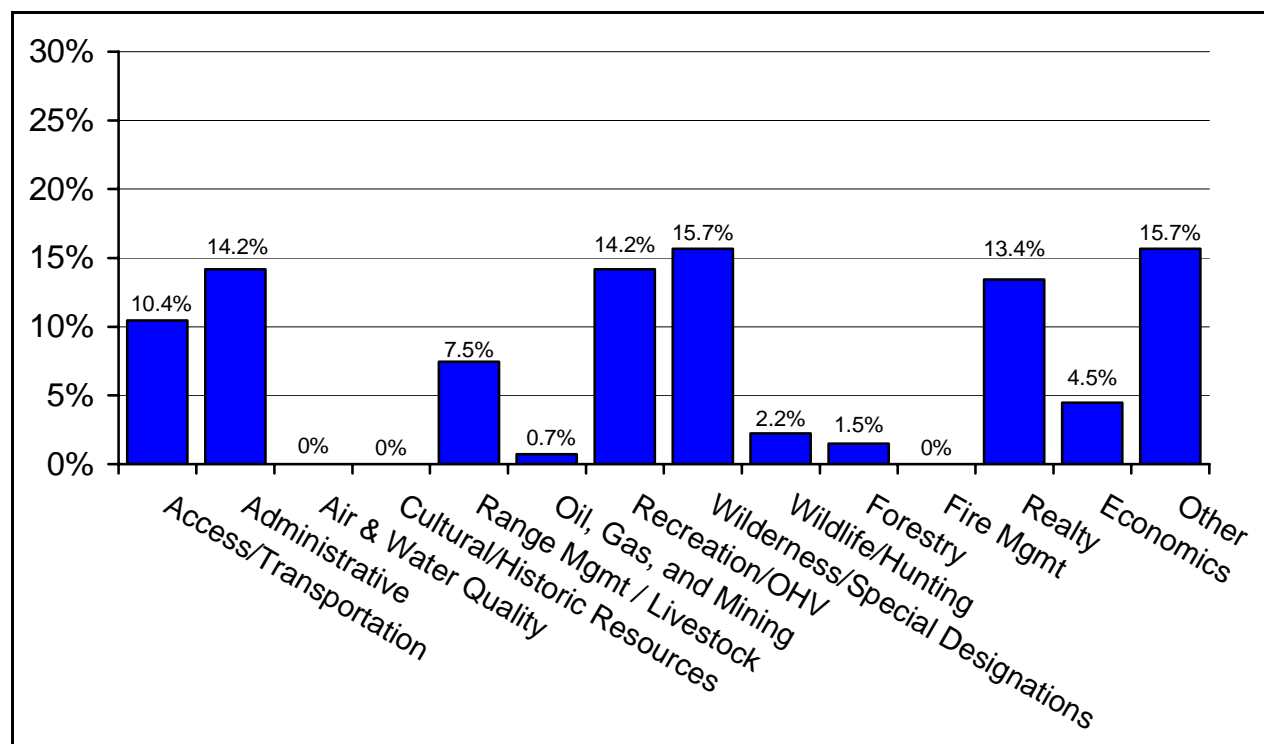


Figure 3.6. Loa Scoping Meeting Comments

Salt Lake City (March 21, 2002)

Total Registered Attendance: 30

The Salt Lake City public scoping meeting had a heavy emphasis on recreation and OHV use. For the most part, the comments were directed towards improved management of OHV recreation resources, with an emphasis on improved OHV opportunities. There were some comments that encouraged strict control of OHVs to minimize the impacts they cause. There was a fairly even split between comments encouraging local/user involvement in decision-making and comments encouraging decisions to be based on objective scientific analysis. Other comments were both for and against new wilderness study areas. Comments concerning economics and realty were also addressed.

Other comments received at the Salt Lake City scoping meeting include:

- Include an economic impact analysis in the RMP decisions process
- We need to make better use of our water resource or we'll lose it
- Define strict restoration and recovery standards that may be required of extractive industries
- Manage and protect watersheds and riparian areas together
- Manage OHVs and other uses along sensible, obvious geographical boundaries
- Stop the causes and spread of invasive species, don't just manage them
- The RMP should make recreation decisions based upon an ROS analysis

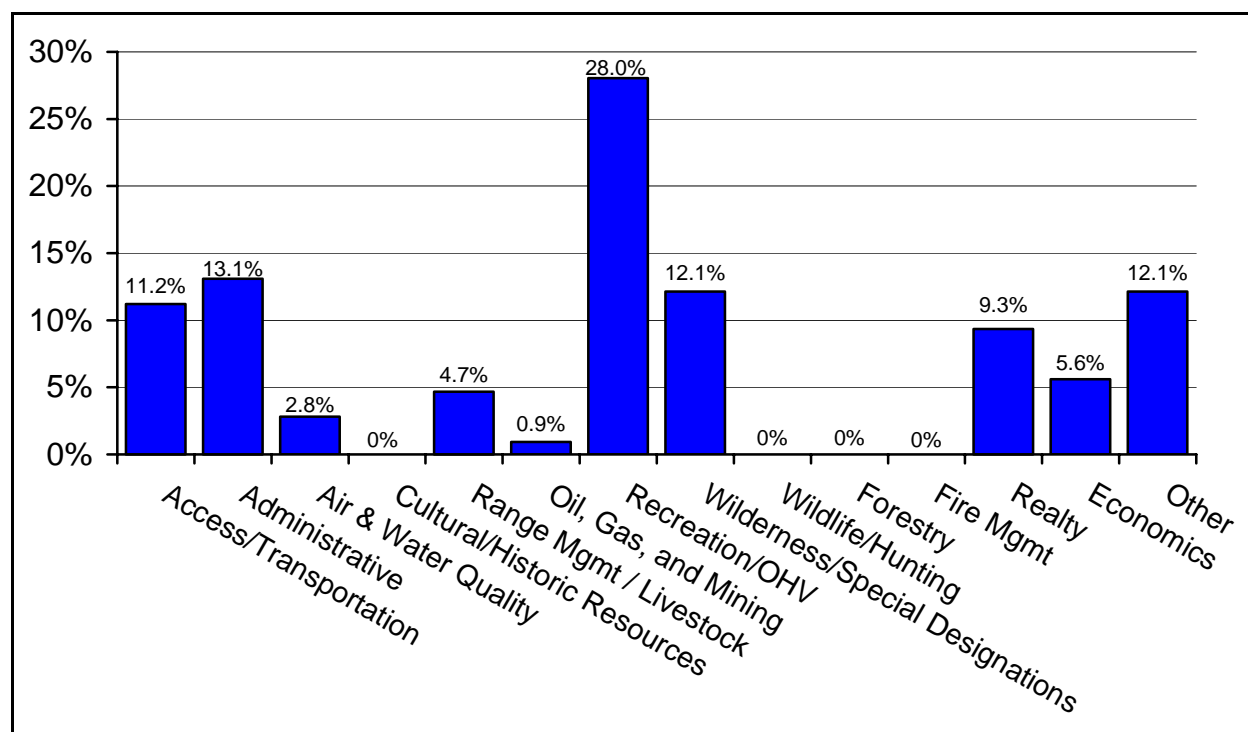


Figure 3.7. Salt Lake City Scoping Meeting Comments

Written Scoping Comments

In addition to receiving comments from public scoping meetings, Richfield FO solicited written scoping comments. Written comments were accepted throughout the public scoping process (November 1, 2001 through April 1, 2002), as well as including comments that were received shortly after the deadline to compensate for mail delay.

Method of Submittal

Written scoping comments were accepted via mail, e-mail, fax, and petition resulting in a total of 1,061 responses, representing nearly 1,100 individuals (Table 3.3).

Table 3.3.

Richfield RMP/EIS Written Comments: Response Source Enumeration

Method of Submittal	Responses Received
Mail	407
E-Mail	10
Fax	25
Petition	619
Total Responses	1,061

Responses from multiple authors living at the same address, or multiple authors with no address listed for each author, were coded as a single response. Several responses were received multiple times and/or in multiple formats (ex. fax and mail). If the author(s) was the same for each response and the comments in the response were identical, the earliest response with the author's original signature was retained in the public record.

Some responses were sent to multiple BLM Field Offices. The other Field Offices would then forward the response to the Richfield FO, often duplicating responses already received. After ensuring the various responses were from the same author(s) and contained identical comments, the earliest response with the author's original signature was retained in the public record.

Geographic Source of Unique Responses

Responses were received from across the country, with most responses coming from states closest to the planning area. Utah generated the greatest percent of responses, with over 47% of mail, fax, and e-mail comments. Responses from Colorado were the next most prevalent, with just over 10% of mail, fax, and e-mail comments. Both petitions were received from Utah, and are not included in Figure 3.8.

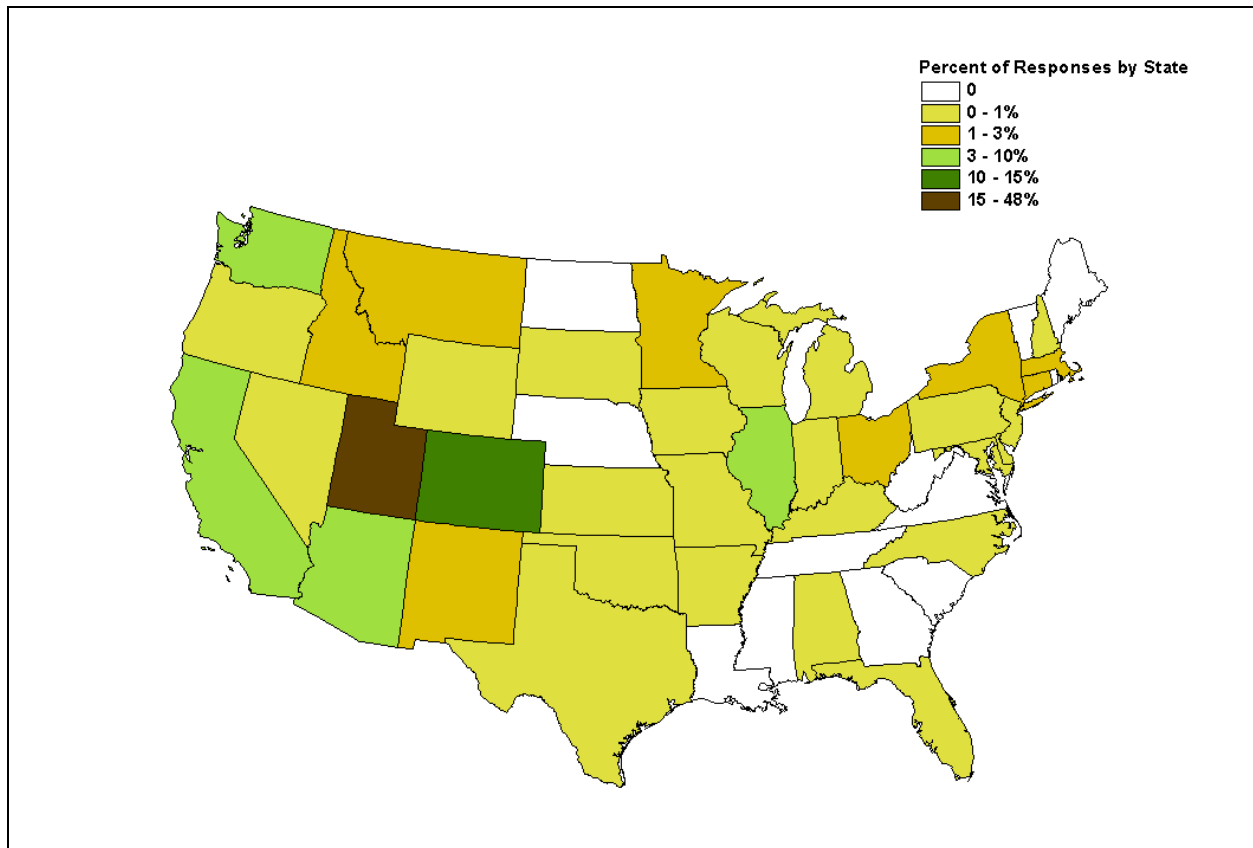


Figure 3.8. Geographic Source of Unique Responses

**Less than 1% of the unique comments were also received from Alaska.*

Number and Type of Comments Received

After the scoping period ended, the responses were numbered and demographic information, such as the source of the response and the author's address, was entered into a database. Each response was read in its entirety and all distinct comments were coded for enumeration and analysis. Comments were enumerated using standard database and spreadsheet software.

Individual comments were coded by primary topic, regardless of the position of the comment towards the topic. Several comments addressed more than one comment category, or topic; these comments were coded by the driving topic unless the associated topics were of equal importance to the issue being presented, in which case the comment was coded under both comment categories. Examples of this include comments regarding surface stipulations for oil and gas drilling in wilderness quality areas in order to preserve the wilderness qualities. There are two potential topics presented, with the driving topic being that of preserving wilderness characteristics.

Comments coded as “Other” generally discussed very broad management concepts or very specific issues.

In addition to being sorted by comment category, the responses were sorted by source of submittal. Mail, fax, and e-mail comments were grouped together, as were petition responses. It should be noted that while the enumeration of various submittal types was performed separately, the comment analysis process considered all comments, written or meeting, collectively.

The following tables and figures (Table 3.4; Table 3.5; Figure 3.9; Figure 3.10) indicate the relative interest of respondents who submitted written comments towards various broad topics in a position-neutral perspective. This enumeration is not intended to show bias towards any issue; it is simply to indicate the level of interest in various issue areas.

Table 3.4.

Mail, Fax, and E-mail Comments: Comment Categories Enumeration

Comment Category	Number Received	Percentage
Access / Transportation	150	8.5
Administrative	64	3.6
Air & Water Quality	14	0.8
Cultural / Historic Resources	13	0.7
Range Mgmt / Livestock	268	15.2
Oil, Gas, and Mining	190	10.8
Recreation / OHV	442	25.1
Wilderness / Special Designations	458	25.9
Wildlife / Hunting	34	1.9
Forestry	19	1.1
Fire Mgmt	8	0.5
Realty	30	1.7
Economics	19	1.1
Other	55	3.1
Total	1,764	100.0

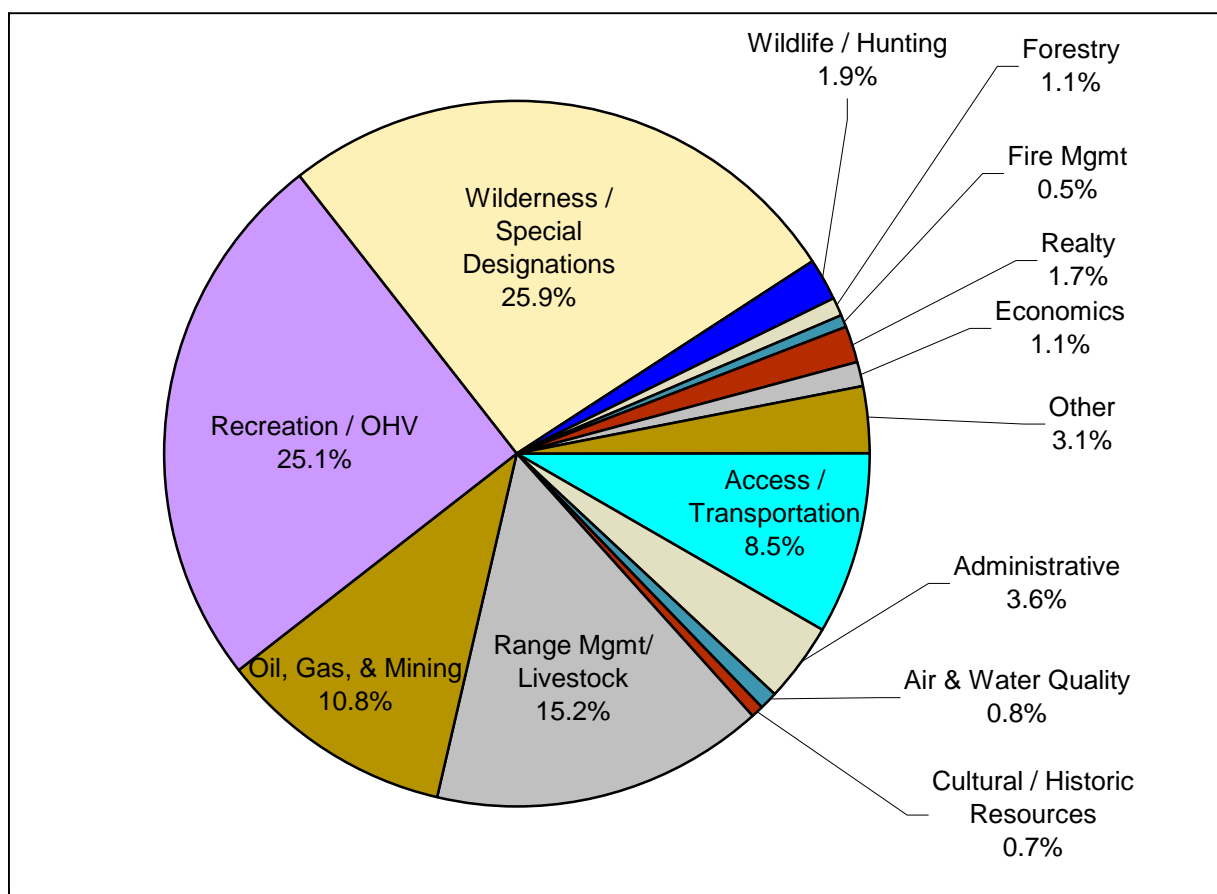


Figure 3.9. Mail, Fax, and E-Mail Comments: Comment Categories Enumeration Graph

Two petition responses were received during the public scoping process addressing seven issue areas and nine separate issues. A total of 619 individuals signed one of the two petitions.

Table 3.5.

Petition Comments: Comment Categories Enumeration

Comment Category	Number Received	Percentage
Access / Transportation	1,236	22.7
Range Mgmt / Livestock	593	11.0
Oil, Gas, and Mining	593	11.0
Recreation / OHV	1,211	22.3
Wilderness / Special Designations	593	11.0
Forestry	593	11.0
Realty	593	11.0
Total	5,412	100.0

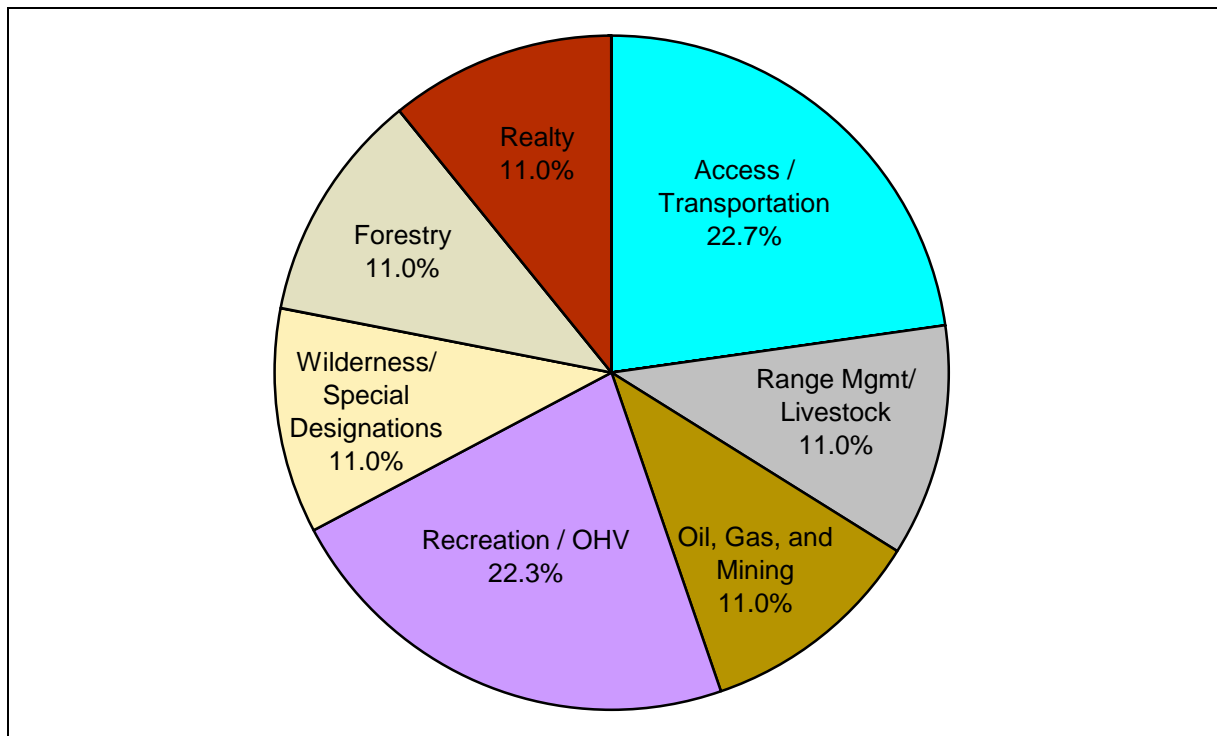


Figure 3.10. Petition Comments: Comment Categories Enumeration Graph

All written comments received throughout the public scoping period, whether received by mail, e-mail, fax, or petition, resulted in a total of 7,176 written comments for consideration in the planning process.

Summary of Written Comments

Prior to coding the written comments, a range of issue areas was developed into which the comments could be organized. These issue areas were expanded as necessary while the written scoping comments were being coded. Following is a summary of the comments received, organized by issue area.

Access/Transportation

A large number of individuals commented on access management. Access was defined in these comments as motorized vehicle access, including roads, trails, and rights-of-way. Many respondents discussed the concept of a network of roads and trails as part of the issue. Vehicle access was discussed as a component of nearly every other resource use. Commentors repeatedly stated that nearly all activities depended on maintaining motorized access to the resource area. Many of the comments explained that a system of road and trail designations might be necessary in order to effectively manage transportation in the resource area.

Perhaps the most frequently discussed item in letters dealing with access was motorized transportation. Respondents consistently described the need to maintain the existing level of motorized road access. Some individuals and organizations felt that additional motorized access was needed in the resource area, while others felt that roads and trails were too pervasive and needed to be limited.

One reason mentioned for keeping roads and trails open to motorized access included the need for equal access to the resource for people of all ages and abilities. This idea was brought forth frequently as a justification for maintaining and/or expanding the transportation network. Several respondents also addressed the importance of road access in order to maintain access for dispersed camping opportunities. Others requested that access be maintained for administrative purposes, and to maintain grazing or mineral development improvements.

Some individuals' opinions disagreed with the open access point of view and called for additional restrictions to motorized access in the resource area. These individuals indicated that resource damage was being caused by vehicle access to the resource area and such access needed to be limited using road closures and restrictions. Writers suggested that an ample or even overabundant amount of road access existed in the resource area and that closures would not significantly affect access to the resource. Conversely, some commentors stated that for every road closed, another should be opened or built to retain access to the resource. Additionally, some commentors desired road construction or re-construction as a means to better preserve the resource by repairing damaged roads and building roads in appropriate locations.

Another common theme throughout individuals' comments was the need for improved trail inventories, mapping, and signage. Many authors requested that the BLM develop a transportation plan that included a thorough inventory of all routes in the resource area. This inventory could then be published in map form for the public to review. Regardless of the type of designations assigned to various routes many people felt that a comprehensive system of signs needs to be installed in order to clarify where travel is appropriate. Many individuals described how resource damage is directly caused by a lack of clear information on the status of roads. An active education program, including clear signage and accurate maps, was the solution most widely proposed to address this problem.

A number of comments addressed the effects that the designation of a wilderness study area (WSA) or Area of Critical Environmental Concern (ACEC) could have on the transportation network. Some commentors suggested that there should be no new designations, while others proposed that roads and/or access to them should be eliminated from existing and future WSA's and ACEC's. The basic

difference in the discussion on roads in special designation areas concerned the amount of impact to other resources. Those in favor of road access argued that roads caused few or no impacts to other resources. Some suggested that roads were necessary in order to properly manage these areas. Those opposed to roads in special designation areas argued that roads lead to increased resource damage from exotic species invasion, increased erosion, and increased air pollution.

Another issue mentioned in several comments was that of backcountry airstrip access. Individuals mentioned backcountry airstrips as a unique and valuable recreation and transportation resource. Specific requests were made that these airstrips be considered in the planning and management effort and that the airstrips be left open. Users of the airstrips state that they have limited impacts to other resources because they require little maintenance, occupy only a small land area, and have only a few users. Many of the comments suggested that the airstrips could be maintained by volunteer groups to avoid additional work for the BLM.

Administrative

Many of the comments received addressed ways in which the BLM might improve some of the practices it uses in the administration of the RMP process. Others discussed ways in which the BLM might improve general agency management, improve interagency cooperation, or work with other organizations. Comments of this nature were categorized as administrative.

Several individuals discussed the public involvement process being used by BLM in the planning process. Some letters dealt with which opinions should be included in the planning process. Some felt that only local input should have significant weight in the process, while others argued that opinions should be sought from a nationwide audience. Nearly all of this type of comment asked for better dissemination of information. A large number of comment authors expressed their desire to be more involved with the planning effort as it progressed.

One of the specific administrative issues mentioned in several comments was cooperation with adjacent landowners. These comments suggested that the BLM make efforts to improve relationships with both private and public landholders in order to improve overall management of the area. Closely tied to this discussion were comments addressing the need for the BLM to improve its relationships with all local area stakeholders including local governments, non-governmental organizations, interest groups, and private citizens.

Other administrative comments received discussed issues such as budget constraints, staff limitations, land exchanges, and other planning efforts.

Authors expressed the need for BLM to evaluate the reality of their plans using budget and manpower estimates. Several comments highlighted the need for this planning process to consider other plans and planning processes in adjacent resource areas to ensure consistent policies.

Some administrative comments requested the RMP/EIS use terminology and language with which current land managers and public are familiar, while other comments requested the BLM follow its legislated guidelines.

Air/Water Quality

Air and water quality were mentioned in comments both as part of other issues and as a separate resource management issue. Respondents mentioned air and water quality as components of range management, mineral development, transportation management, recreation management, and special management designations. The comments received show that air and water quality are a concern of many individuals and organizations.

The primary water quality issue introduced by the commentors is that of livestock grazing in riparian areas. Individuals encouraged an inventory of riparian areas and management direction to preclude grazing in these areas. Other individuals showed concern over water pollution in the form of sediment loading. These comments were often related to roads or OHV use. Other comments related to water quality mentioned the desire to see natural stream corridors protected.

One of the items discussed in comments was concern over the amount of dust produced by roads in the resource area. Both individuals and organizations expressed interest in decreasing the impacts to air quality from roads and OHVs. Several comments indicated a need for improved monitoring and modeling of air quality in the resource area and region in order to assure that standards are actually being met. Some comments brought up concerns over air pollution from nearby power plants and the general increase in use and development of fossil fuels.

Cultural/Historic Resources

Cultural and historic resources were not frequently mentioned. The broadest mention of these resources was in blanket statements that requested all cultural resources, as well as other sensitive resources, be protected as ACECs. More specific comment did address these resources and several related issues.

Several commentors requested a full inventory of all cultural and paleontological resources to avoid conflicts with other resource uses, such as OHV. Some

individuals requested not authorizing OHV use until this inventory had been completed. Others focused on damage to cultural resources caused by livestock and range improvements such as chaining and other range improvements. Comments related to this issue referred to the Programmatic Memorandum of Agreement between the Utah State Historical Preservation Office (SHPO) and the BLM.

A few individuals requested protection of historic sites such as old mines, cabins, settlements, railroads and other features used by pioneers, homesteaders, loggers, settlers, and miners, and related their protection to motorized access so more people could enjoy these resources.

Some respondents referred to the link between cultural resources and Native American Tribes. These individuals opposed any proposal involving the potential to disturb the human remains of Native Americans.

Range Management/Livestock

Range management and issues associated with livestock and grazing management were frequently submitted comments. Comments of this type generally fell into one of several categories including, grazing rights, ecosystem integrity, invasive species, wild horses, and the importance of grazing to the local economy and lifestyle. While the comments fell along a spectrum of potential range management strategies, there are clearly two predominant points of view: those who wish to limit or eliminate livestock grazing and those who wish to maintain it.

Grazing permits were discussed in a large number of comments and were identified as connected to a wide spectrum of other resource issues. A few commentators argued that grazing was a right and should be treated as such. Many of these individuals suggested that limiting or eliminating grazing was an inappropriate and perhaps illegal management strategy.

Accompanying the arguments for grazing as a right were a significant number of individuals that questioned the economics of grazing permits and the level of subsidy being provided by the BLM to grazing permittees. Some of these persons questioned the price of an Animal Unit Month (AUM) as well as the number of AUM's permitted in certain areas. There were numerous letters with concerns about the methods used to determine livestock stocking rates. These commentators specifically requested a refined scientific approach to determining allowable stocking rates.

A large percentage of the comments identified the issue of ecosystem health as related to grazing as a necessary part of RMP analysis. Nearly all of the

comments expressed a desire to maintain and improve range health, but the opinions on how to achieve this varied widely. Many comments identified a need for increased vegetation quantity and quality. Some comments stated that this could be accomplished without reducing grazing, while others felt the only way to achieve this goal was through a decrease in grazing.

A large number of individuals requested that grazing be restricted or eliminated from riparian and other sensitive resource areas. Reasons for this request indicated that ecosystem function was being severely impacted by the presence of grazing in these areas. Conversely, there were some comments that indicated that grazing was not having negative impacts on riparian systems and that if properly managed it could be beneficial to these areas. Some individuals were of the opinion that livestock grazing could help reduce invasive species and decrease soil loss in riparian areas. A few persons requested that the RMP use the best data and science available to determine the actual impacts of grazing in riparian areas and then apply strict standards to maintain and improve the ecosystem function of the riparian zones. Some comments also identified seasonal grazing restrictions as a potentially useful range management tool.

Another aspect of rangeland ecosystem health that was frequently mentioned in the comments was the management of exotic/invasive plant species. A large number of commentators requested that the RMP take steps to stop the spread of exotic species and restore native vegetation. Many of these comments also identified the need for more thorough inventories of invasive plants. A number of individuals were concerned that invasive species management has focused on mitigation rather than prevention and requested that areas particularly sensitive to invasion be closed to high-risk uses. These individuals and groups also felt that an analysis of the spread of invasive species should include an analysis of vectors that transport seed. Some individuals identified the need for careful analysis of the costs and benefits of using non-native plants as range prescriptions. Many of these persons asserted that the risks of species introduction often outweigh any benefits such a prescription might provide.

Some respondents identified the importance of public lands grazing to local communities as a way of life. These individuals asserted that livestock grazing can be a sustainable use of the land and a way of sustaining local economies. Many of these individuals felt that it was very important that public lands grazing be recognized as an historically important use of lands and that this use be allowed to continue to preserve this culturally significant activity. There were comments that differed from this point of view in terms of the sustainability of public lands grazing, but no individuals or groups downplayed the historical importance of grazing.

Among the other range management issues identified by scoping comments were wild horse and burro herds, artificial water developments, and range treatments. Some individuals were concerned about horse and burro herd numbers as they related to overall grazing and available forage. Some of these persons requested the complete removal of these herds while other comments discussed the possibility of reducing herd numbers to lessen their impacts and ease the competition for forage among livestock, wildlife, and wild horse and burro herds.

Many commentors identified artificial water developments as a management action they felt was harming the resource. These individuals requested that the RMP examine the possibility of prohibiting the development of artificial water sources for livestock grazing. Some comments differed from this point of view and felt that water developments could be an effective range management tool when used correctly, in addition to providing important water resources to wildlife.

There were some individuals that expressed concern over range treatments that conflicted with overall range health. Chaining was specifically identified as a range treatment that needed further analysis, with proponents on both sides of the issue. Individuals and groups also requested that the use of fire for range treatment be closely examined.

Finally, several individuals stated that standards for rangeland health, including monitoring and assessment programs, must be employed to determine management objectives for livestock grazing.

Oil, Gas and Mining

Items related to mineral exploration, leasing, and development were frequently mentioned topics in many of the comments received. Commentors identified a full range of issues both in support of and against oil, gas, and mining development. The majority of the mineral development comments discussed administrative, economic, access, or ecosystem health issues. Each of these categories was discussed as it relates to oil, gas, and mining.

Many of the respondents suggested that a full EIS for every permit application was a necessary process, and that an environmental assessment (EA) would not be sufficient. There were also individuals who stated that future technology may make parts of the resource area more desirable for development.

Some commentors explained the need for more reasonable reclamation and mitigation standards for all mineral developments. Some individuals' comments

identified a need to retain the possibility for development in large parts of the resource area in order to anticipate future needs.

Many individuals specifically requested the broad use of the No Surface Occupancy (NSO) designation for WSA's, ACEC's, and other special management areas. Persons also requested that the EIS examine seismic exploration for mineral resources and potentially restrict its use in special management or sensitive resource areas. Concern over the visual impacts of oil and gas development was a primary theme in many of the comments. Many individuals suggested a need for improved administration of previously developed sites to improve safety, ecosystem health, and visual appearance.

Connected to the administrative comments on these issues were comments targeting the need to improve mitigation, reclamation, and restoration standards for mineral developments. These comments identified a need to strengthen protective standards for the land and its resources. Impacts to wildlife were also noted as a serious consequence of minerals exploration and development that needed to be included in the EIS.

Economics were also mentioned as a factor for considering restrictions on oil and gas development. Individuals requested that cost/benefit analyses include the full costs of the impacts caused by mineral development. These individuals also cited the potential benefits of alternative uses to oil and gas development as an important factor for the RMP to consider. Some persons identified the future need for mineral resources as a possible reason to restrict current resource development. There were also some individuals that identified alternative energy sources as an issue for the RMP to examine. Environmental justice, as related to short term planning horizons, was also mentioned as an issue for further analysis.

Many commentors identified access for oil and gas development as a significant problem in the resource area. Some of these individuals requested that no oil and gas leasing be allowed in the resource area, while others suggested that NSO be a standard stipulation for all leases in the area. Many of these individuals requested that the suitability of mineral development be examined across the resource area and strictly limited to areas where it was most appropriate. There were also persons identifying the need to withdraw sensitive resource areas in order to protect them from the impacts of development.

Some individuals' comments combined the need for successful wildlife management with continued energy resources development, seeing wildlife management as a common impediment to oil, gas and mineral development. These individuals suggested that the restoration and protection of ecological systems serves to strengthen these resources and thereby permit energy

development without severe restrictions. Linked to these individuals' comments are others that encourage every effort to mitigate the impacts of energy resources development on public land.

Finally, comments linked oil, gas, and mineral development impacts to water quality in two ways. First, impacts from access roads and ground disturbing activities related to energy resources development effected erosion and water run-off. Second, some commentors encouraged the impacts of coal-bed methane (CBM) development be addressed carefully in the EIS in regards to process water, suggesting that it be re-injected into the source strata to avoid contaminating surface water or aquifers.

Recreation/OHV

Comments related to recreation were the second-most frequent type of comment received. Many different types of recreation activities were identified as important to individuals and organizations. Access for these uses was a major theme in many of the comments. OHV use was the subject of many comments as well, with a large number of associated issues mentioned. Other comments included discussion on the compatibility of recreation with other resource uses as well as social and ecosystem conditions.

A wide variety of recreational uses were mentioned in the comments. Each of these uses had an issue or issues to be considered in the RMP analysis. Some respondents dealt with the need for more and improved trail and trail-system opportunities. Individuals identified a lack of single use trails, with a few comments identifying a lack of single-track motor vehicle trails. A number of persons indicated that the RMP needed to consider ways to make group recreation permits easier to obtain, with the opportunity for more competitive events with few restrictions, such as the requirement for groups to have insurance, or restrictions on group size. Some individuals also expressed a desire for family motorized recreation areas where younger riders could learn to ride without experiencing user conflicts.

One concern that individuals frequently expressed was the desirability of primitive recreation experiences. These individuals encouraged the BLM to recognize the demand for primitive recreation experiences and to designate more areas with Recreation Opportunity Spectrum (ROS) designations that would protect these experiences.

Another comment that was repeated frequently by commentors stated that the new RMP should establish ways to maintain dispersed camping in as many areas as possible. Desire for dispersed camping was connected to nearly every recreational activity and was a consistent theme across all types of users. There

were also some individuals that expressed desire for a limited amount of developed camping areas with some primitive facilities. Individuals felt that these would be good sites for large groups, families, and a good management tool to reduce the impacts of camping in some areas. Some individuals thought that developed campsites could be built with facilities for OHV use such as unloading ramps, hardened parking areas, restroom facilities, and trail information in a centralized location, such as a staging area at the entrance to a loop trail system.

A number of respondents addressed the use of horses and other pack animals in the resource area. These groups and individuals expressed interest in seeing the RMP maintain all of the existing opportunities for horseback recreation, with trails designated for horses where OHVs would be absent. Some individuals focused on maintaining a river-based primitive recreation experience that minimized impacts to the resource. Several comments were received regarding recreational use of backcountry airstrips. In addition to airstrips as an access issue, these groups and individuals believe that airstrips should be analyzed as a component of recreation planning in the RMP. Nearly all of these commentors stated that recreational use of backcountry airstrips was compatible with almost all other resource uses and had little impact on the ecosystem.

One of the persistent themes in comments regarding recreation in the planning area was the need for OHV access for recreation users. Individuals described vehicles as more than recreational equipment, but as a means of access to other activities. These people requested that the RMP take this into consideration.

Another frequently mentioned category of recreation experience was wilderness and primitive recreation experiences. Many of the commentors wanted the RMP to consider the impacts that all other uses could have on wilderness recreation. There was clear interest in maintaining and improving opportunities to access wilderness sites and other primitive areas. Several of these individuals stated that motorized and wilderness opportunities could coexist if they were planned for in the RMP.

Another category of comments went beyond activity level concerns and addressed a general need for improved recreation management by the BLM. Some of the topics mentioned in this category were improved education, expanded law enforcement, better signage, and more innovative on-the-ground management. Improved user education was frequently requested. Individuals, organizations, and other governments stated that increased user education should be a key component of the RMP. Commentors claimed that education would solve many resource degradation and user conflict problems.

Connected with many of the requests for user education were a number of individuals' comments that identified a lack of law enforcement as one of the reasons for resource degradation and user conflict. These individuals identified a need for an expanded law enforcement program and gave several enforcement related suggestions. A large number of commentors suggested a peer enforcement program using OHV groups and other volunteers to educate users and enforce regulations. These suggestions indicated that this type of program could be an option to establish user group partnerships and increase public participation in BLM decision-making.

In addition to peer enforcement, there were many persons that requested more law enforcement officers throughout the area. Individuals and groups identified a visible law enforcement presence as one of the best deterrents to resource damaging activities. BLM law enforcement was one need mentioned by commentors, but coordination with local law enforcement was also frequently discussed. Commentors requested that the RMP consider ways to increase communication and coordination with local law agencies. Many of these individuals felt that local agencies could provide a more thorough and user-friendly enforcement presence.

A need for improved recreation signage was another frequently received comment. Users identified the lack of signs on roads and trails as one of the primary causes of resource degradation in the planning area. Numerous requests were made for the RMP to design and implement a comprehensive and consistent system of signage for all roads, trails, and other recreation sites. Such a system should tie in to trail designations and trail loops. Signage could also incorporate user education in the form of trailhead kiosks and interpretive signs in appropriate locations. Suggestions also stated that trail signs and designations should include what types of vehicles are permitted and/or restricted in certain areas in order to improve resource use and decrease user conflict. In addition to signage and designations for roads and trails, some individuals identified a need for a quality recreation map of the planning area. These individuals assert that a quality map in conjunction with enforcement, designations, and signage would minimize future resource damage.

Route designation was one of the items addressed both in comments related to access as well as those related to recreation. Access related comments indicated a need for general route designation. Recreation comments also expressed a need for specific route and area designations. Many of these letters and comments described classification systems by trail or for certain areas that would indicate the type of allowable use. Commentors requested that the RMP consider concepts similar to recreation zoning and/or single use trails. Reasons for these requests were incompatibility of certain recreation uses, degradation to the resource caused by unclear regulations, mitigation of user conflicts, and a desire

for various types of recreation experience only available when other uses were taking place in other areas or at other times.

The other primary type of comment received in regard to recreation dealt with the compatibility of recreation with other resource uses. Many individuals stated that recreation could be managed in such a way as to be compatible with almost every other resource use including the needs of wildlife, mineral development, special designations, cultural resources, and grazing. A number of these individuals wanted the new RMP to plan for increased recreation. Suggestions on accomplishing this included seasonal restrictions to activities, strategic route designations, and improved planning coordination.

Finally, several individuals referred to the potential growth in recreation users and the impact that growth would have on local economies. Many of these people want the BLM to analyze the potential economic impacts of recreation use, inclusive of all recreation uses.

Wilderness/Special Designations

Comments received regarding wilderness and other types of special designations were the most frequent type of comment. Unlike most of the other types of comments, wilderness comments were either for the use of special designations or against them. Many individuals indicated support for existing WSAs and ACECs and requested that the RMP consider additional designations. Conversely, many other individuals stated that WSAs and other designations were too restrictive and had been overused in the past. These people usually supported no new special designations in the new RMP. Some of the designations to which these comments refer include WSAs, Wild and Scenic River designations, ACECs, wilderness proposals, Special Recreation Management Areas (SRMA), and the uses allowed in these designated areas.

Wilderness and WSAs were the primary point of discussion in the designation type comments. Many of these commentors indicated that WSAs were one of the most effective ways to protect the ecosystem and asked that the existing WSAs be maintained and additional WSAs be designated. These individuals stated that the ability to limit certain activities and uses in these areas was one of the primary benefits of their use. Individuals mentioned the decreasing amount of wilderness quality lands and requested that the remaining wilderness quality lands, designated or not, be preserved for future generations. Individuals specifically mentioned oil and gas development, OHV use, and livestock grazing as some of the resource uses incompatible with wilderness quality areas. They asked that these resource uses be restricted in all existing and future WSAs.

Many respondents expressed opinions opposite to those that supported WSAs. These people identified WSA designation as an undue restriction to many activities. Many of these individuals pointed out that existing and potential WSAs included points of interest and recreation sites that they liked to visit via motor vehicle. Use of the WSA designation precluded access to these areas and kept all but the most hearty individuals from having their desired recreation experience. In addition, several of these persons stated that current land uses and technologies would allow use of the land with minimal impact. Individuals requested that the RMP not allow additional designations to cut off access to such areas and that existing WSAs be examined for ways to allow increased access for recreation and other uses. Maintaining access where it has been historically was one of the themes of this type of comment.

Public involvement on WSA designations was requested in many of the comments. Individuals commented on both sides of this issue, both for and against wilderness designations, with the central theme encouraging the BLM to review public information concerning what is and/or is not land with wilderness characteristics. Related to this, there are several commentors that disagree with the accuracy of the BLM's current wilderness inventory. These individuals came from both sides of the wilderness issue, with some of their comments stating that there was too much land currently under consideration for wilderness recommendation while others claimed there was too little land waiting for WSA status.

In many cases, individuals indicated a desire for the RMP to consider additional areas for WSA designation. Specifically, the respondents mentioned parts of the planning area described by the Citizen's Wilderness Proposal, from Utah Wilderness Coalition, and the proposed America's Redrock Wilderness Act. Commentors requested a re-inventory of these areas for their wilderness potential and that they be managed like wilderness areas until such an inventory and designation has taken place. Suggestions on how the RMP could accomplish this included (NSO) stipulations, mineral withdrawals, OHV use restrictions and grazing exclusions.

Many comments also ran counter to this suggestion and stated that there should be no additional WSAs. The comments' authors asked that serious consideration be given to the management of WSAs that lacked wilderness characteristics and whether or not additional activities could be allowed there without impacting their current condition. A large number of these people indicated that the current condition of some WSAs was incompatible with any type of wilderness designation and that the RMP should address how to manage these areas in a way more suited to their condition. Many commentors indicated that the reason for the dismissal of these lands from wilderness designation is the presence of roads, historic mineral development, range improvements, and recreational uses.

These individuals' comments suggested that the best use for parts of the existing and proposed WSAs be continued use. There were requests that the RMP consider another level of resource management that would limit some types of use, but not be as restrictive as wilderness designation. These individuals described a level of management similar to a Semi-Primitive Motorized classification on the Recreation Opportunity Spectrum (ROS) where the impacts caused by some uses were only temporary and often reduced by natural processes.

Counter to these ideas was the expressed opinion that activity in WSAs should be limited to non-motorized recreation. Individuals and organizations stated that WSAs should not allow activities such as mineral development, grazing, or motorized access. WSAs were described as a place for a primitive recreation experience away from other types of resource use. Activities mentioned in comments as suitable for the WSAs were hiking, horseback riding, and mountain climbing.

Some individuals didn't specify a position concerning the designation of wilderness, but requested that the process simply be completed. Related to these comments were other individuals that wanted a time limit on WSA designation (either from Wilderness Inventory Area (WIA) to WSA or from WSA to wilderness).

Wild and Scenic Rivers were mentioned in the comments received. Most commentors expressed a desire for the BLM to consider river segments within the planning area for eligibility and suitability for designation. Some people indicated that any restrictions to access that might be caused by Wild and Scenic designations should be carefully considered in the RMP.

Comments related to ACECs were common. Persons writing these comments requested the BLM designate all lands that contain significant cultural, geological, scenic, recreational, and plant and wildlife habitat values as ACECs. A few people referred to very specific places that should receive this designation. As with the wilderness comments, some people felt that ACEC designation would be too restrictive or would lead to WSA designation, and were opposed to any new ACECs.

A number of comments were received that referred to other special designations such as Visual Resource Management (VRM) and Special Recreation Management Areas (SRMA). The individuals submitting these comments requested that WSAs be designated VRM Class I while semi-developed areas around energy resource development be designated VRM Class II. There were very few comments related to SRMAs, and when there was a comment, it usually referred to a specific piece of land that should receive this designation.

Some individuals requested that the RMP evaluate the effectiveness of devising recreation zones based on the ROS. These persons described compartmentalization of recreation uses in order to reduce user conflict and improve recreation experiences. Other people discussed ACEC's and their effectiveness at protecting sensitive resources. Some of these individuals identified specific areas for ACEC designation such as the Factory Butte area, lands near the towns of Grover, Torrey, and Teasdale, areas along the Fremont River, and others.

Several individuals specified how special designation boundaries should be chosen. There were generally two types of comment regarding this issue: one, that special designation boundaries should be obvious and easy to locate, and two, that there should be a larger buffer between special designation boundaries and lands with vastly different uses. The authors of these comments pointed out that land users can't tell "on the ground" where map grid lines are located. As a result, these individuals encouraged special designation boundaries to be delineated by landmarks to help the land user know what is allowed where. In addition, some persons wanted a larger buffer zone between special designations such as wilderness and adjacent lands with different uses.

Finally, there were some individuals that encouraged the BLM to maintain special designation continuity between land management agencies (Forest Service, National Park Service), as well as between BLM Field Offices.

Wildlife/Hunting

Comments on wildlife management and other issues associated with animal species in the planning area were received from many individuals and organizations as well as some government agencies. A wide range of issues were addressed in these comments, including the following:

- Winter range management
- Threatened and endangered species
- Hunting opportunities
- Interagency consultations
- Predator management
- Wildlife/livestock conflicts
- Water developments
- Wildlife introduction
- Range treatments
- Permitting policies

Most commentors supported the presence of wildlife in the planning area, but suggested different approaches for the BLM to provide suitable habitat. Some comments focused on maintaining big game species while others emphasized native species management. A number of individuals suggested ways that the BLM could improve wildlife administration with different management actions, better science, and improved communication.

One of the issues addressed was the need to minimize conflict between wildlife and other resources. Many individuals identified recreation (hunting/OHVs), mineral development, and grazing as uses that have potential wildlife conflicts. These individuals suggested that the RMP identify ways to limit these impacts through closures or restrictions. Some comment authors identified another side to wildlife conflicts with other resources, stating that wildlife was given preferential treatment over livestock. Several commentors voiced concern that wildlife management and re-introductions were often performed at the expense of local ranchers. These persons requested better planning for future management actions so these impacts could be minimized.

Other respondents addressed the need to manage for and protect native species. Many individuals requested that all special status species in the planning area be given significant management attention in the RMP. Some individuals focused on limiting the amount of management attention paid to non-native species' habitat management as well as avoiding the introduction of new non-native species. Commentors specifically mentioned a need for management attention towards threatened and endangered (T&E) species.

Many comments addressed BLM administrative and management actions that impact wildlife habitat and wildlife management by other agencies. There were specific requests that the RMP eliminate range treatments such as chaining and guzzler-type water developments,. There were also a number of comments in favor of these practices. Individuals stated that consultation with the wildlife agencies needed to occur early in the process and needed to produce comprehensive wildlife plans for all sensitive wildlife species. Concerning fire management, there were some commentors that wanted the EIS to address fire management policies and the effect those policies would have on wildlife habitat.

Individuals also mentioned a desire for continued hunting access to the planning area with improved coordination between agencies.

Forestry

There were a few comments that identified forestry related issues. The specific forestry related issues were fire management, forest inventory needs, and a desire to see commercial timber harvesting in the resource area. Those individuals that mentioned fire management indicated that forested and non-forested areas lacked natural fire regimes and that controlled burns should be examined as a management tool. These persons pointed out a need for cooperation between forest landholders, and brought up the possibility of commercial timber harvests in the resource area. Several individuals expressed a desire for firewood collection and for Christmas tree cutting be allowed to

continue. This was related to both the access issue and the forestry issue. Forest management was also described as potentially beneficial to watershed, wildlife, preservation of cultural heritage, and livestock management.

Fire Management

There were a few comments pertaining directly to fire management. Commentors generally encouraged the re-establishment of a natural fire regime. Some of these people encouraged prescribed burns as a range management tool. Some respondents wanted to see more consistency in fire management policies. There were a few individuals who wanted to see fire directly managed in areas that are inhabited or where there is a property or life danger. These individuals suggested that fire should be allowed to run its natural course in all other areas.

Realty

Several realty related comments were received. Most of these commentors specifically referred to land trades with the Utah State Institutional Trust Lands Administration (SITLA). Individuals support both sides of this issue, with some comments in favor of land trades with SITLA, hoping those trades would lead to economic development in counties that are largely owned by the Federal government. Other individuals were against trades with SITLA, fearing that subsequent development of the traded lands would spoil the rural atmosphere of the area, as well as strain public resources. Some individuals encouraged the BLM to trade or buy land as a consolidation tool, trading out checkerboard in-holdings throughout the management area, but specifically in wilderness and other sensitive resource areas.

Comments concerning land trades with SITLA mainly referred to areas in Wayne County, specifically around the towns of Grover, Torrey, Bicknell, and Loa.

Economics

Comments received on the economics of the resource management plan indicated a need for more in-depth analysis of the impacts of resource management decisions. Respondents indicated that there are costs and benefits to many resource uses that the BLM is failing to acknowledge in its decision making process. The predominant theme in nearly all of the economics comments was a desire for a full accounting of all costs and benefits of all uses and management actions.

Many commentors expressed a desire for maintaining or expanding the local economies by allowing the most economically beneficial resource uses to occur. Some of the resource uses that were specifically mentioned as having economic

benefits included mineral development, grazing, and tourism. OHV use was frequently mentioned as an economically beneficial activity. Grazing was depicted as being essential to the local economy and any restrictions to livestock uses would have significant economic repercussions. Mineral development was mentioned, as well. Many of these commentors requested that the impacts of any management decisions be examined in terms of potential changes caused to cities and towns.

Some individuals indicated that there were also costs associated with resource uses that were not being counted. Among the costs mentioned were environmental remediation for mineral development sites, management for OHV use, and range management for livestock grazing. Individuals stated that these costs need to be quantified and included in decision-making processes. Some commentors described the concept of total economic value (TEV) and how a complete economic analysis would include components of TEV including non-market values.

Other

Comments that were categorized as “Other” did not have a single theme that was easily identifiable or in some cases covered many different topics. Some of the comments related to issues that were extremely narrow, and/or received very few comments. Since a summary of the comments in this category would be impractical, a sample of some of the topics are listed below.

- Need to retain multiple use management guidelines
- Education of land users
- Management of seed collection and collectors
- Enforcement of policies and laws
- Protection of water rights
- Don't use comments as votes
- Ecosystem management

Additional comments categorized as “Other” are listed in Appendix A.

4 - Comment Analysis

Scoping is a dynamic process that leads to the identification of issues to be addressed in the Environmental Impact Statement (EIS) and the Resource Management Plan (RMP). The resulting planning issues can generally be stated as resource management problems and opportunities that the Bureau of Land Management (BLM) needs to address to ensure it is fulfilling its multiple use resource management mission. This comment analysis is a combination of issues developed through BLM scoping, public scoping meetings, written public scoping comments, and inter-agency scoping. Since the scoping process is dynamic, scoping issues are subject to change throughout the planning process as new conditions are identified.

Issues are listed below, with planning efforts and sub-issues related to that issue listed as brief, bullet list items:

Management of access/transportation:

- Inventory routes
- Designate routes (open/closed/limited)
- Inventory and manage backcountry airstrips
- Mitigate route impact, both to users and to resource
- Provide access for multiple uses (recreation, mining, ranching, etc.)
- Plan for consistent route designations with adjacent landowners

Management of planning and general administration:

- Facilitate the dissemination of information (plain English, good maps, etc.)
- Cooperate with adjacent landowners (Federal and private)
- Plan for realistic budgets and manpower

Management of Air/Water Quality

- Comply with all applicable local, state, tribal, and Federal laws, statutes, regulations, standards, and implementation plans
- Manage and restore wetlands/riparian areas
- Update water inventory database
- Identify water quality concerns and evaluate limits of acceptable change related to BLM authorized activities on public lands
- Identify and develop management criteria for actions allowed within priority watersheds within the planning area

Management of Cultural/Historic Resources

- Modernize management to reflect new laws, regulations, manuals, and program guidance
- Standardize management
- Consult with Native American Tribes
- Inventory all cultural and paleontological resources

- Provide a more active and educational forum for management (science, education, recreation, research)

Management of Range Resources/Livestock and Grazing

- Incorporate Standards for Rangeland Health, Guidelines for Grazing Management, and Guidelines for Recreation Management
- Evaluate seasons of use in relation to Utah's Guidelines for Grazing Management
- Allow OHV use for grazing management purposes
- Evaluate current forage allocations for wildlife and livestock and evaluate range capability and impact to range resources in relation to exercise of full grazing preference
- Evaluate need for access and maintenance to existing range projects as well as development of new projects
- Apply standards to all activities and set priorities for development of guidelines for all surface disturbing activities
- Establish criteria for use of native vs. introduced species for rangeland rehabilitation
- Maintain functioning native communities and restore at-risk or non-functioning native communities
- Complete soil surveys and Ecological Site Inventories
- Identify and evaluate the use of key species for quantifying impacts of grazing on forage plants
- Update the list of and management of special status plants
- Management of noxious weeds and exotic/invasive vegetation
- Develop pest management criteria for grasshopper and cricket control
- Establish criteria for transplanting or augmenting populations
- Manage of Wild Horses and Burros

Management of Oil, Gas and Mining Resources

- Update/identify mineral development potential throughout planning area
- Review mitigation and lease stipulations and ensure consistency throughout the planning area.
- Analyze potential for unleased coal, combined hydrocarbon leases, and salable and locatable minerals
- Address potential exploration methods
- Address stream flow/water quality impacts from mining

Management of Recreation and OHV Use

- Review Special Recreation Permit (SRP) policies and regulations
- Establish limits of use or limits of acceptable change that will protect resource values while satisfying the public's demand for these uses
- Assess recreation patterns and analyze impacts on other resource values.
- Designate and define routes (open, closed, limited)

- Establish criteria to provide consistent application of special and extensive recreation management areas within the planning area
- Evaluate the management of existing recreation developments as well as the need for new facilities (dispersed vs. developed camping, current vs. potential trails, etc.)
- Review and modify existing OHV designation where needed to meet changing resource objectives
- Coordinate OHV designations with Price FO
- Analyze designations for OHV play areas and authorized trails
- Organize recreation according to the ROS
- Address group size
- Provide information to recreation users (maps, kiosks, signs, etc.)
- Plan for enforcement with current budget and manpower
- Consider economic value of recreation

Special Designations

- Address inconsistencies with management prescriptions regarding OHV designations in WSAs
- Develop consistent management strategies for existing WSAs throughout the planning area
- Consider whether or not inventoried areas with wilderness character should be managed as WSAs
- Address public input concerning inventoried wilderness quality lands
- Complete eligibility assessment for Wild and Scenic Rivers
- Perform suitability analysis for all eligible Wild and Scenic Rivers, including those that cross jurisdictional boundaries
- Review Visual Resources Management (VRM) classifications to assure consistency of application throughout the planning area
- Establish criteria for management within VRM classes
- Review and modify, if appropriate, management prescriptions for existing ACECs
- Revisit previous ACEC nominations and solicit new nominations
- Establish priorities for management plan development and implementation for ACECs

Management of Wildlife

- Update wildlife and habitat inventories
- Document special status species locations, populations, and habitats
- Update management of special status species (rare, threatened, endangered, sensitive, etc.)
- Review and set schedules for revision of habitat management plans (bison in particular)
- Evaluate current forage allocations, particularly where big game species have moved into new areas

- Set strategies to allocate forage for future Utah Division of Wildlife Resources' transplants
- Include the management of the Animal Damage Control program in accordance with the National and State Memorandums of Understanding (MOU)

Management of Forestry Resources

- Update the inventory of forest resources
- Standardize treatments of woodland products and prescriptions
- Continue to allow firewood collection as a forest management tool

Fire Management

- Address appropriate fire management actions and locations for those actions
- Address types of fuels and the proximity of those types of fuels to homes

Management of Lands and Realty

- Include transportation planning in the planning effort
- Manage utility right-of-way corridors
- Ensure access to public lands
- Evaluate and prioritize proposals for land tenure adjustments in the context of facilitating resource management objectives
- Review recent land tenure adjustments or ownerships and management agreements
- Include direct management of acquired lands.
- Review current withdrawals
- Address source protection for municipal culinary water

Other

- Review permits for seed collection
- Plan for and manage hazardous materials and wastes

5- Issues Outside the Scope of the RMP/EIS

Several issues were mentioned or referred to in the public scoping comments that are beyond the scope of the Environmental Impact Statement (EIS) or Resource Management Plan (RMP). Due to the broad nature of an RMP, the resolution to these issues is, for the most part, through Congressional or Judicial action.

RS-2477 Roads

One frequently mentioned item in discussion of access was Revised Statute (RS)-2477. RS-2477 was a one-sentence provision in the Lode Law of 1866. In its entirety, RS-2477 states: “The right of way for the construction of highways over public land, not yet reserved for public uses, is hereby granted.” This statute remained in effect until the passage of the 1976 Federal Land Policy and Management Act (FLPMA). Upon repeal, existing rights under the statute were preserved, while new rights-of-way across Federal lands were subjected to approval and permitting by the appropriate Federal agency.

Individuals expressed concern in comments that the Bureau of Land Management (BLM) has not adequately addressed this issue despite the ongoing litigation. Many comments identified a desire to see the access and roads issues related to RS-2477 litigation resolved. A large number of the comments received clearly stated a preference to have all historical access routes recognized and continued use of these ways permitted. Most of these comments were directed towards resolving the legal complications of the RS-2477 issue, but discussed ways to manage the transportation system in a manner consistent with the intent of that legislation. Many commentors stated that a balanced system of road management could be achieved without final legal decision.

This issue is currently tied up in litigation and is awaiting decision. BLM will make every effort to produce a workable transportation plan in conjunction with the RMP

Wilderness Designation

A large number of comments were received asking that the wilderness designation process be completed. Although the BLM has the ability to inventory areas for wilderness character and manage Wilderness Study Areas (WSA), it does not have the regulatory power to formally declare wilderness areas. As a result, this issue is only resolved with Congressional designation and is beyond agency scope in relation to existing WSAs.

Wild and Scenic River Designation

Several commentors indicated a desire to see the BLM designate Wild and Scenic Rivers. Wild and Scenic River designation is a three-step process; the BLM is charged with two of these steps. BLM will be conducting an extensive study to determine those

river segments that are eligible for consideration as Wild and Scenic, and then those segments that are actually suitable. Following this study, only Congress can complete the process by designating Wild and Scenic Rivers.

Potential San Rafael National Monument Designation

A number of respondents in this planning process discussed the potential proposed San Rafael National Monument. This issue is not in the scope of the RMP since the monument proposal is considering lands that are not within the jurisdiction of the Richfield Field Office. Information regarding the monument proposal can be obtained from the Emery County Public Lands Council (www.emerycounty.com).